Analysis of EIS Scoping Public Comments for the One Seattle Comprehensive Plan Update

By Affordable Talaris, a working group of Share The Cities

November 14, 2022

Executive Summary

- Public engagement in the Scoping Phase in summer 2022 was relatively high compared to past Comprehensive Plan updates.

- The vast majority of community members who engaged in the Scoping Phase want to end exclusionary zoning. A small but vocal minority of mostly single-family homeowners are opposed, sometimes because of harmful biases they harbor.

- 63-69% of submitted emails and top-level comments on the Engagement Hub support a degree of city planning that corresponds to Alternative 5 or bolder.

- The most popular Engagement Hub comment was Real Change's call for publicly-owned multi-family housing in ALL neighborhoods, accompanied by provisions for a 15-minute city.

- Grassroots organizing efforts were important drivers of public engagement during the scoping phase.

- Commenters brought up additional ideas for improving our city including converting some golf courses to housing and parks, adding more public bathrooms, reforming design review, environmental justice to address racial inequity, and policy impacts on the accessibility of new housing.

Introduction

Every [ten years](#), the City of Seattle updates its Comprehensive Plan, which determines allowed land use patterns in the city for the next twenty years. Each Comprehensive Plan update consists of four phases, as shown in the graphic below and in [this linked .PDF presentation](#) from the City of Seattle:
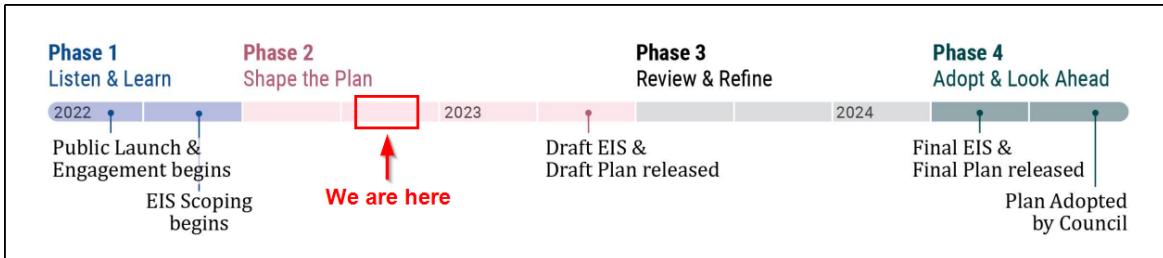
Seattle's multi-year [state-mandated](#) Comprehensive Planning process will culminate in late 2024 in a report that the City Council and Mayor can use to create new land use and zoning rules.

Prior to the Environmental Impact Statement (EIS) Scoping period that began this summer, the City of Seattle Office of Planning and Community Development (OPCD) sketched out five initial high-level "Proposed Alternative" growth strategies for consideration and discussion. Some used a ["chocolate chip cookie" analogy](#) to explain how these Alternatives focused on neighborhood- level patterns of development. They ranged from Alternative 1, offering no new growth strategies beyond status quo, to Alternative 5, a combination of growth patterns discussed in Alternatives 2-4 with a stated goal of including more neighbors in more areas of Seattle. At the end of EIS Scoping, for the rest of Phase 2 - Shape The Plan, the city must determine the range of Alternatives it will study and consider in the next phase, taking into account the feedback collected.

During the EIS Scoping Comment Period for the 2024 Comprehensive Plan update, which lasted from June to August 2022, the City of Seattle collected over 1,000 comments from community members and organizations on the city's initial "Proposed Alternative" strategies for how the city should grow and where it will make investments over the next several decades.

In this short report, we summarize and analyze the content and preferred "Proposed Alternatives" endorsed within these 1,000+ comments.

Methodology

Fourteen volunteers in Affordable Talaris, a working group of [Share The Cities](#), read and reviewed each one of the comments posted to the [One Seattle Plan Engagement Hub](#) website, as well as all of the email feedback received by OPCD.

Reviewers assigned each comment a grade according to the criteria denoted in the table below, and noted the Proposed Alternatives preferred and dispreferred by the commenter. After one full read through of all the comments, peer reviewers went back and cross-checked 30% of the public comments

(mainly those with intermediate grades, assuming that top and bottom grades were more certain) to confirm the grade initially assigned.

Affordable Talaris also created a [searchable website](#) to improve transparency and public access to emailed comments, which aren't available for review on the Engagement Hub website.

Comments that did not mention a preferred Proposed Alternative, but which instead focused solely on issues outside of the Comprehensive Plan's scope—for example, tree canopy or bicycle/transit lanes, which are guided by Seattle's Parks & Open Space and Transportation Plans, respectively—were difficult or impossible to classify in terms of the amount of growth and new neighbors that were desired. Consequently, many of these comments could not be assigned a grade.

Affordable Talaris

Table 1. Comment classification criteria

How well the comment meets the scale of our challenges	Definitions
Utterly fails	- Utterly fails to meet or ignores the scale of our challenges - Prefers Alternative "0" or 1 - Claims we already have enough capacity "We must study needed new infrastructure to death before we even consider building any new housing" or "Transit first - upzoning/new houses later" "We need to preserve tree canopy above all else / tree canopy important for livability and should not be 'sacrificed' for new housing" "Use existing buildings for housing rather than building new housing" "My (affluent/white) neighborhood has done its part" "White neighborhood/homes should be a historic district" "Density makes the city not livable" - Ecofascist sentiment or "more new housing would just make more people come here" - Anti-renter sentiment - Racist/classist/ageist/ableist sentiment
Fails	- Fails to meet the scale of our challenges - Prefers Alternative 2 or 4 - Leans toward low growth or expresses need to limit growth "Trees and housing can go together but we should still be overly careful about how new development is done and go slowly" "More density but need to carefully consider the impacts" "Supply doesn't matter - only affordability" "New development/upzoning will make everything unaffordable, only benefit developers"
Partially	- Only partially meets the scale of our challenges - Prefers Alternative 3 - Leans toward moderate growth - More housing but on arterials/near transit only
Mostly	- Mostly meets the scale of our challenges - Prefers Alternative 5 - Wants maximum change of presented options - Still comfortable with concentrating more growth on arterials even though they want a bit denser housing everywhere - Wants only missing-middle housing everywhere or only 3-stories everywhere - If they say nothing else but "get rid of single-family zoning"
Fully	- Fully meets the scale of our challenges - Prefers Alternative 6 or higher - Wants bold change "Eliminate all exclusionary zoning" + wants more than just missing-middle housing "Study environmental impacts of not building housing" or having to raze trees and build housing in exurbs - Allow property owners to build as much housing as possible in every residential neighborhood - Calls for ending bans on all forms of housing in every residential neighborhood - Upzoning *and* social housing

Analysis and Results

Part 1: Public engagement in the scoping phase was relatively high compared to past Comprehensive Plan updates.

Eight hundred fifty-one (**851**) comments were posted in the Engagement Hub, while **153** comments were submitted to OPCD by email and made available to the public. People interacted heavily with the Engagement Hub submissions with nearly **20,000** total upvotes and downvotes. We were disappointed that OPCD collected upvotes and downvotes but did not include this community feedback in their EIS Scoping Report.

Part 2: The vast majority of community members want to end exclusionary zoning, but a small minority of vocal mostly single-family homeowners are opposed, sometimes because of harmful biases they harbor.

We found that **63% to 69%** of submitted emails and top-level comments on the Engagement Hub support a level of city planning that corresponds to Alternative 5 or bolder (Figures 1-2).
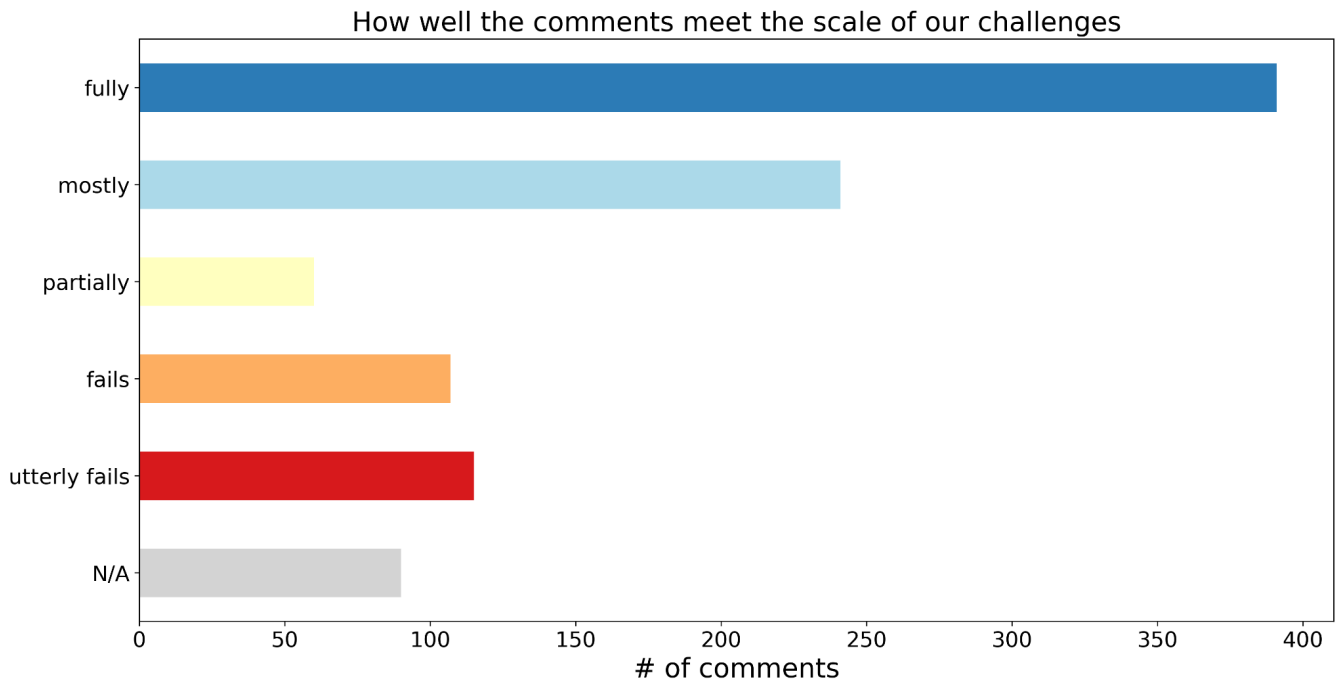

Figure 1. Number of emails and top-level comments on the Engagement Hub falling within each of our classification groups of how well the comment meets the scale of our challenges.

How well the comments meet the scale of our challenges

All comments and emails

fully 38.9%
mostly 24.0%
N/A 9.0%
partially 6.0%
fails 10.7%
utterly fails 11.5%

All graded comments and emails

fully 42.8%
mostly 26.4%
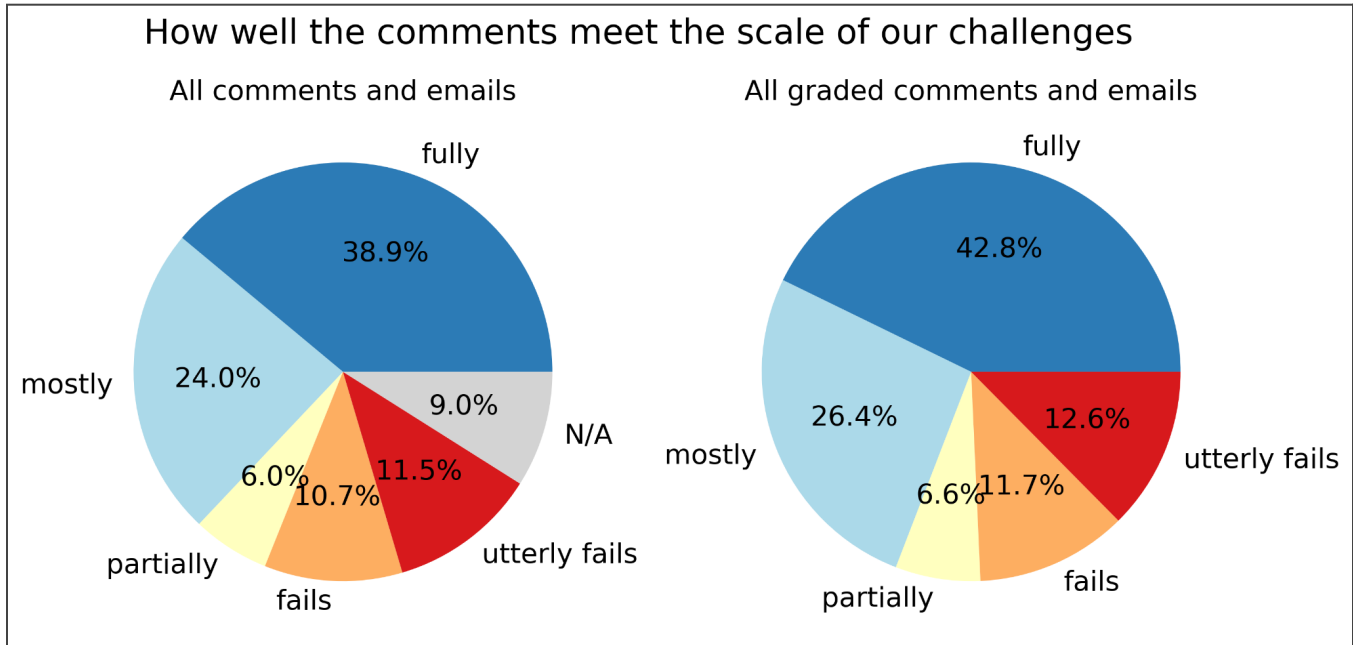partially 6.6%
fails 11.7%
utterly fails 12.6%

Figure 2. Percentages of emails and top-level comments on the Engagement Hub falling within each of our classification groups of how well the comment meets the scale of our challenges. The left-side chart includes all comments and emails, even those that could not be graded. The right-side chart excludes comments and emails that could not be graded.

Explicit preferences for Alternative 5 or 6+ make up the great bulk of all comments, which is in alignment with what the city found, *though for unknown reasons, the total number of comments classified into preferred Alternatives by the city was much lower* (Figures 3-4).
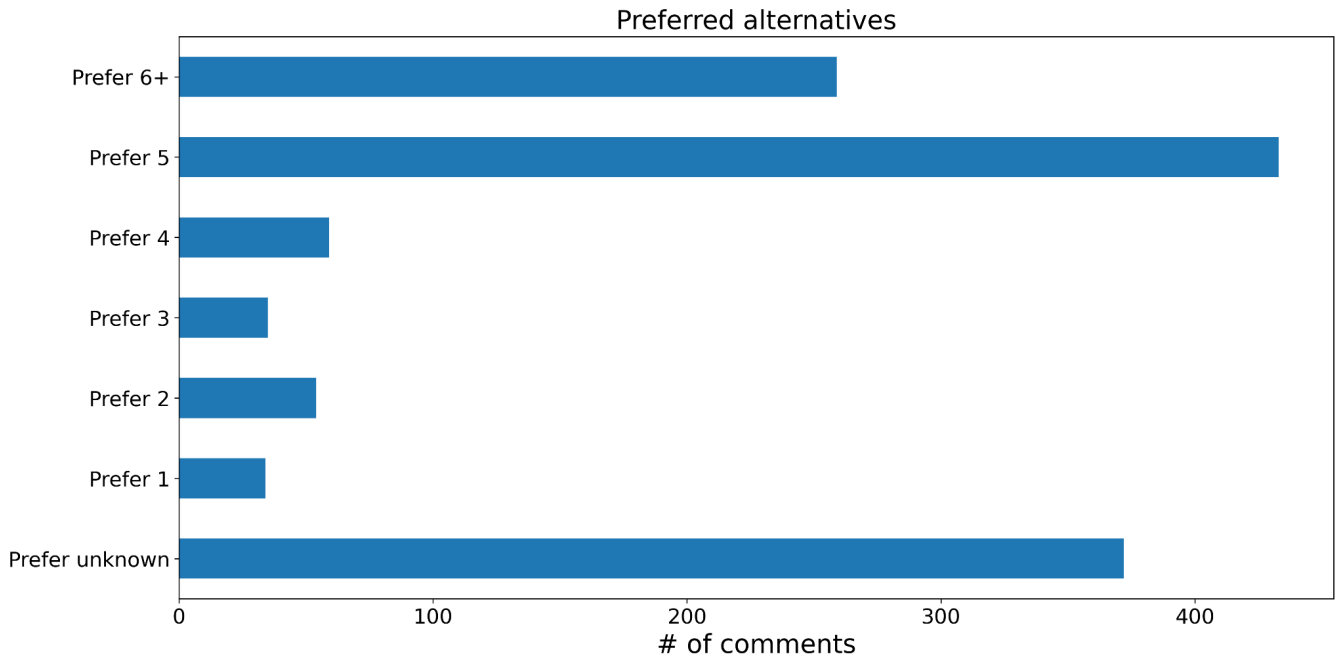

Figure 3. Number of emails and top-level comments on the Engagement Hub with a stated preference for each Alternative. Note that any individual comment could have preferred multiple alternatives. If, for example, a comment preferred both Alternatives 5 and 6, then that comment is counted once in the "Prefer 5" column and once more in the "Prefer 6+" column.
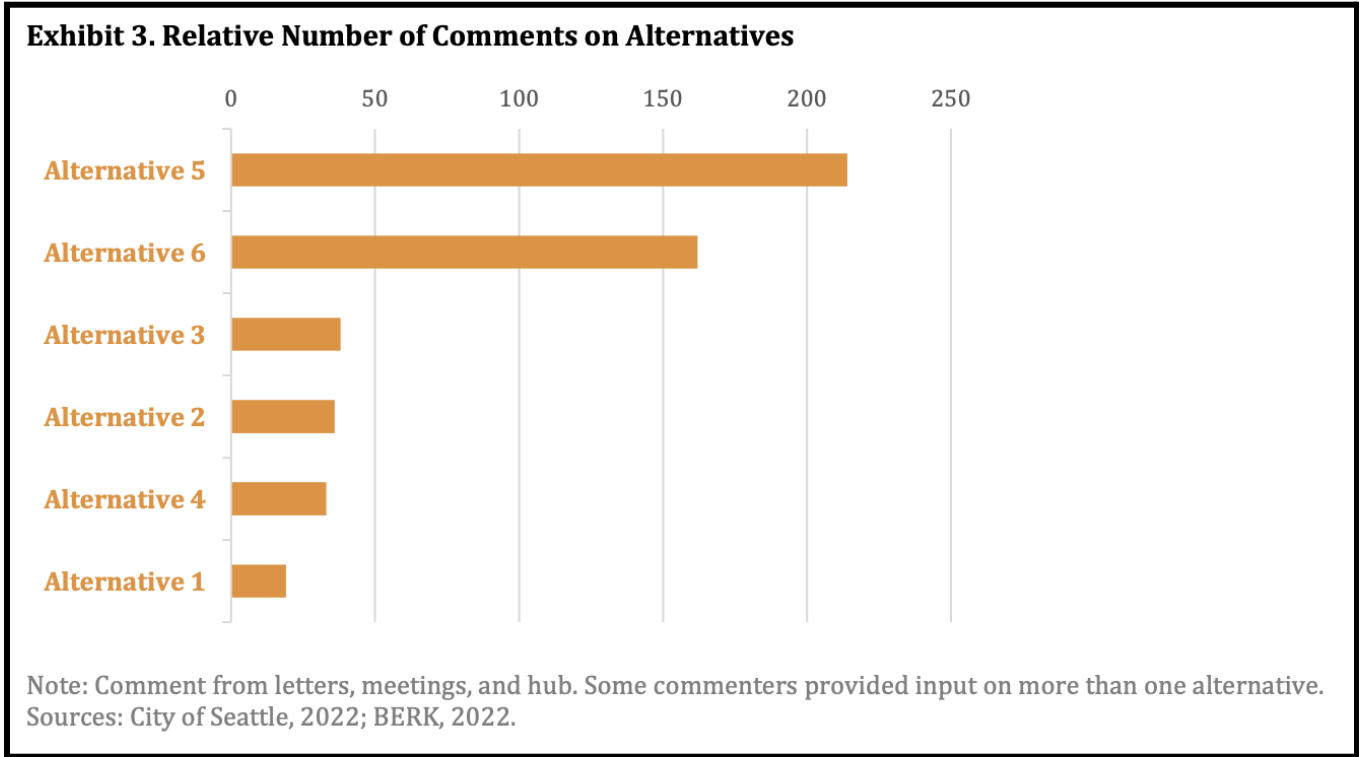
Exhibit 3. Relative Number of Comments on Alternatives

Note: Comment from letters, meetings, and hub. Some commenters provided input on more than one alternative.
Sources: City of Seattle, 2022; BERK, 2022.

Figure 4. *The number of comments preferring each Alternative according to Exhibit 3 from the City of Seattle's analysis.* *Source*

Upvotes and Downvotes

According to our classification system, the more fully the comments meet the scale of our challenges the higher the number of net votes they received. Method: calculating total upvotes minus downvotes.

On average, a comment that fully meets the scale of our challenges received **26 net votes**; in contrast, a comment that utterly fails to meet the scale of our challenges received an average of **-3 net votes** (Figure 5). In total, comments that fully meet the scale of our challenges received a whopping **9,379 net votes**, while comments that utterly fail to meet the scale of our challenges received **-212 net votes** (Figure 6).
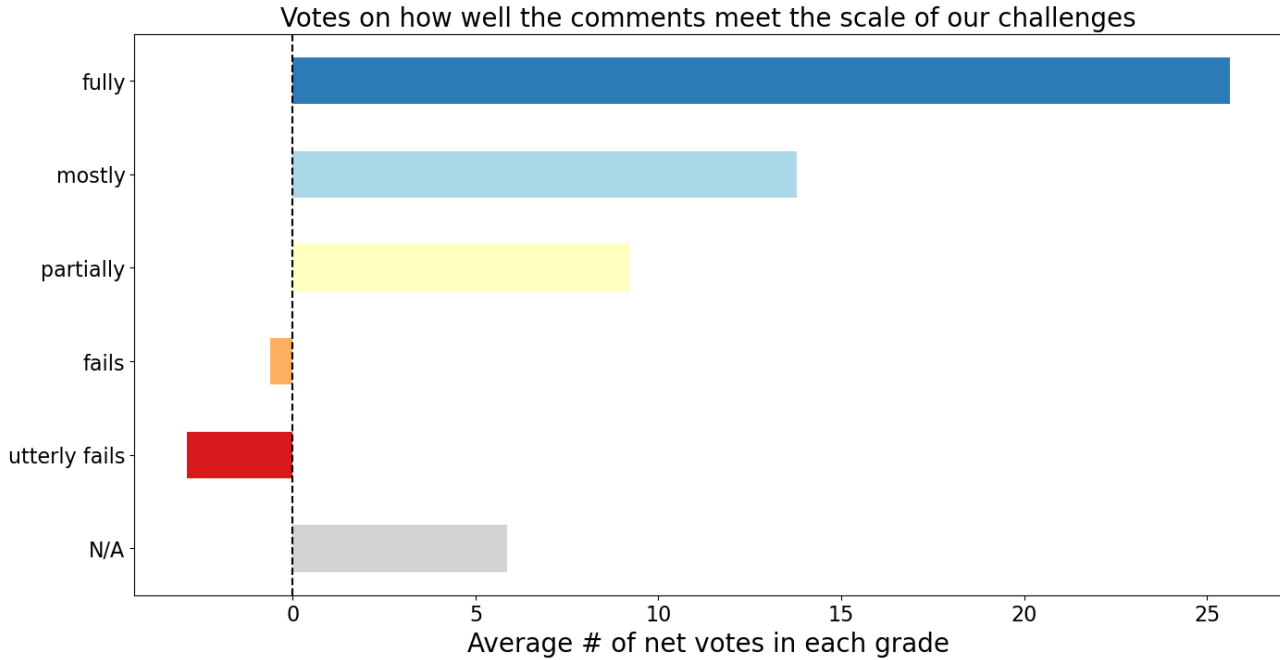
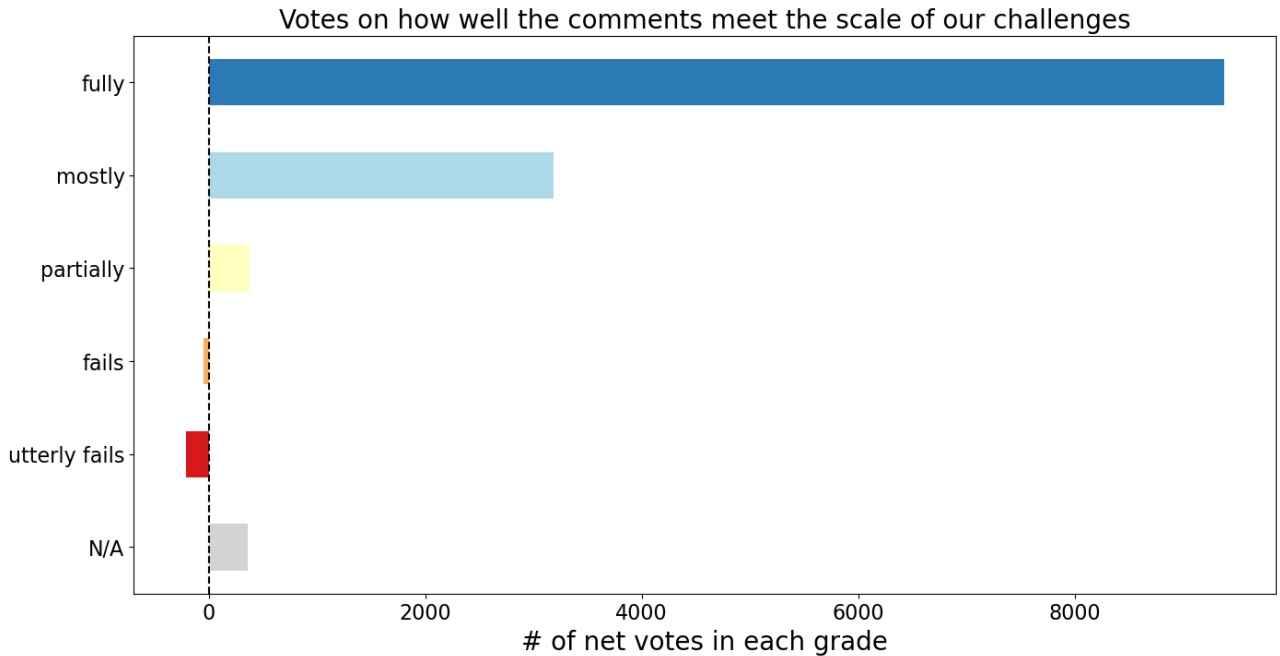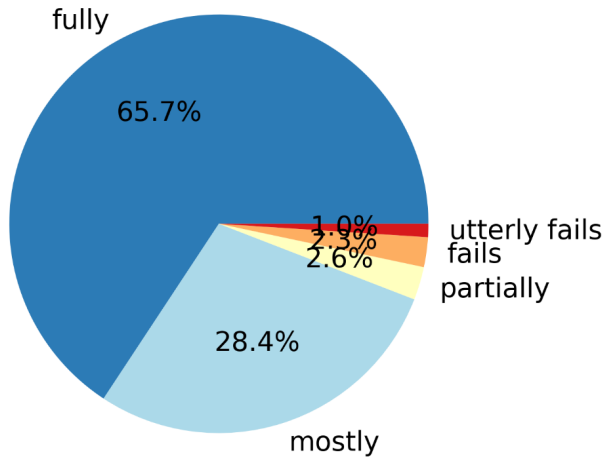**Figure 5.** *The mean number of net votes for each comment type.*

Figure 6. *The total number of net votes for each comment type.*

We also found that **>94%** of graded Engagement Hub submissions that received at least the median number (7 or more) of net votes support a level of city planning that corresponds to Alternative 5 or bolder (Figure 7).
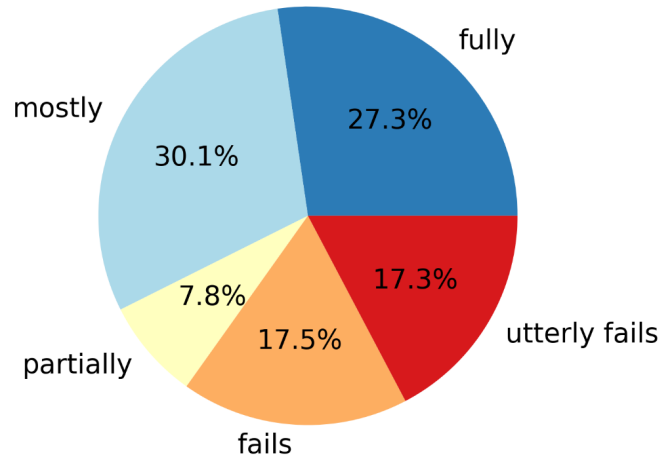
Figure 7. *Percentages of graded comments with more than the median number of net votes (left-side) versus fewer than the median number of net votes (right-side).*

As can be seen in Figure 2 above, people who spoke up in favor of Alternatives that fail or utterly fail to meet the scale of our challenges made up **22-24%** of emails and top-level Engagement Hub comments. The proportion of comments with these sentiments were higher in emails than in Engagement Hub comments. These community members pushing for low and no-growth Alternatives also expressed concerns reflected in some representative quotes below, grouped into broad categories:

CONTENT WARNING: RACISM, CLASSISM, ECOFASCISM, AND ANTI-RENTER BIAS

- **Renters, multi-family home dwellers, and MHA residents are not good neighbors**
  - "Stop ruining our beautiful single family neighborhoods with your poorly thought out destruction of what makes our neighborhoods so great. Indiscriminate densifying enriches developers and gives an undeserved lift to people who didn't work to get their way into a nicer area."
  - "I can't agree with the comments that want to burn it all down and build whatever, where ever. Single family neighborhoods and their residents are not evil, they are the backbone of this city; paying taxes, donating time, providing jobs and caring as only homeowners do."
  - "We need to retain some neighborhood cores that are owner occupied. This population (which has other alternatives ie the suburbs) provides both a civic and economic base for the city...I also know that activists believe that renters are just as committed to neighborhoods as owners and based on my experience of the last four years of living in the city, you'd have a very difficult time convincing me. My renting neighbors, in what would be considered a nice Seattle neighborhood, do not extend themselves to neighbors (ie don't build relationships), lend a hand to keep the neighborhood clean or invest in any way to improve the property. The property owners are absentee."

- ○ "Waste removal should be studied… requiring all buildings to provide non-spill type containers with on-site container storage, and not permit them on streets and sidewalks after pick up, especially in MHA housing units so all streets can be free from refuse container blight."

- **Preservation of neighborhood character, historic district designation, trees, and birds is more important than housing people**
  - ○ "You think folks are unhappy with no affordable housing- they will be just as unhappy if there are no trees, birds, plants and flowers to settle their anxious hearts."
  - ○ "We have lost birds because their habitats have been taken from them. The quality of life is more important than housing."
  - ○ "An entire neighborhood of one to one-and-a-half story historic Craftsman-style homes in the Densmore Avenue area of Wallingford may soon be required to accommodate a 45' tall, 19-unit apodment on a 4,000 sq ft lot with no parking or neighborhood amenities…The project covers the maximum building envelope and deprives the neighborhood of diminishing sun, light, trees, parking, and privacy." And from the same comment: "My example above, identifying a 45' tall apodment, will only hasten the devolution of a unique neighborhood of existing, comparatively affordable Craftsman homes."
  - ○ "This must include particular attention to and evaluation of our historic neighborhoods, especially those identified as National Historic Districts. These areas represent unique historical features that may be lost if not addressed carefully as we develop density in our neighborhoods."

- **The problem is too many people and too much population, not a lack of housing**
  - ○ "What is ignored is that city policies and upzoning CREATE THE GROWTH. "
  - ○ "We have a housing problem, but the lack of housing didn't generate the problem. Too many people is the underlying problem."
  - ○ "The more fundamental question that these simplistic calculations does [sic] not answer is, 'what is the sustainable population of Seattle?' …there may be practical limits to how much can be done and a hard cap may be necessary to avoid overshooting what is a sustainable population in Seattle. Certainly avoiding generating growth by controlling commercial construction is the first option."

END OF CONTENT WARNING

Part 3: The most popular Engagement Hub comment was Real Change's call for publicly-owned, multi-family housing in ALL neighborhoods, accompanied by provisions for a 15-minute city.

The comment receiving the most votes on the Engagement Hub was a proposal for Social Housing from Real Change that also included a request for changes to zoning and design review. Social housing, as defined by Real Change, is publicly owned housing, funded through cross subsidized rents, as opposed to low income housing tax credits that funds most subsidized housing, that has a renter majority board to center the clients of housing in decision making.

Widespread support for social housing was seen across the public comments. 10% of all online engagement hub top-level comments and emails express explicit support for social housing (97 comments on the online engagement hub and 10 emails). Additionally, top-level comments supporting social housing on the online engagement hub garnered 2,928 upvotes (18% of all upvotes) and 2,003 net votes (15% of all net votes).

Seattle voters will get to vote on the I-135 social housing initiative on February 14, 2023.

Part 4: Grassroots organizing were important drivers of public engagement during the scoping phase.

There were clusters of comments, likely generated through grassroots organizing focusing on two themes. First theme: the Alternative 6 webpage inspired community members to go beyond the boundaries of the city's Alternative 5 growth pattern. No alternative 6 ideas were presented as an option by the city, so Affordable Talaris volunteers created a webpage, alternative6.org. Community members were able to generate a comment by choosing **their personal vision** from a large drop-down menu. In order for the city to receive their comment the individual had to create an account in the City of Seattle Engagement Hub and cut and paste their comment into it. Alternative 6 visions for Seattle started with the premise that Alternative 5 did not meet the scale of our housing challenges, but generated a range of additional personalized comments and inclusive engagement in the One Seattle process.

Second theme: comments received for *tree canopy prioritization across any alternative chosen*, were likely driven by specific calls to action by Friends of Seattle's Urban Forest and Tree PAC.

Part 5: Organizational Comments

We encourage you to search through our scoping search webpage or read the city's appendix (linked at the end of this report). It is valuable to read community, neighborhood, and governmental organizations comments, including the Laurelhurst Community Club, Thornton Creek Alliance, NAIOP - the Commercial Real Estate Development Association, Puget Sound Regional Council, Washington State Department of Transportation and more. These comments have lengthy PDF attachments and generally use policy-oriented language, consistent with how organizations of such size tend to engage with public processes. Governmental organizations emphasized governance, oversight, and collaboration issues, such as making policies compatible with each other.

Part 6: Commenters brought up many additional great ideas for improving our city.

Although the following topics may not officially fall within the scope of the discussion the city was looking for as part of determining the parameters of the Draft EIS, many commenters felt that it was important to bring up the following:

- Desire for social housing
- Desire to convert some land currently used as golf courses to housing or parks more accessible to more people
- Desire for a 15-minute and car-light city
- Desire to mitigate health effects (air quality, noise, mental health) of living on arterials
- Desire for more opportunities for small business
- Many mentions of unfortunate economic and cultural displacement from Seattle and into Kent, Renton, Lynnwood, etc. and the associated long commutes because of high housing costs
- Desire to curb light pollution

- Desire to account for lack of equitable access, ie. new multi-story townhouses without elevators
- Desire to account for racism and rectify through environmental justice
- Desire for green buildings / passivhaus
- Desire to abolish or at least expedite design review and permitting processes
- Desire for more public bathrooms
- Desire to eliminate food deserts
- Desire for more parks
- Desire for ecodistricts
- Desire for new land value taxes
- Desire for land trusts
- Desire for better stormwater management

Next Steps and How to Engage

In the next stage of Environmental Impact Statement activity, OPCD will create a Draft EIS with three Alternatives that will go through another round of community engagement.

1. *Create an account!* in the [Engagement Hub](#) to receive updates about critical meetings and surveys. *You do not have to be a Seattle resident to engage*. We encourage people in the Puget Sound region who have been displaced from Seattle, or who have never been able to afford to live in Seattle, to take an active role in shaping the city's future.
2. *Get involved!* There are several [upcoming meetings](#) to provide in person feedback to the city. We urge the City of Seattle to set considerate meeting times, arrange for child care, and take all possible steps (childcare, translated materials, paid focus groups) to ensure a more equitable process.
3. *Listen to youth!* We also hope to see a youth engagement strategy deployed in Seattle Public Schools and other spaces where young Seattleites gather. Youth ideas, vision, and passion for a better Seattle should be centered in this process.
4. *Learn about [social housing](#)!* The top comment in the engagement hub was "Alternative 6: Social Communities for All" from [Real Change](#)
5. *Let's build equitable communities!* Seattle should no longer allow downtown real estate interests, longtime homeowner voices, wealthy tenants, for-profit developer interests, and other traditionally privileged voices to dominate our most impacted and vulnerable communities. The One Seattle Comprehensive Plan must prioritize people with disabilities, [Equitable Development Initiative](#) organizations led by communities of color and immigrant communities, LGBTQIA+ folks, suburban workers who are forced into long commutes to job centers in Seattle, and low-income folks throughout the region who might be a paycheck away from homelessness.

[Affordable Talaris](#) is a volunteer group of Seattle neighbors who are concerned about climate change, access to green space, and affordable housing in Seattle. Readers are invited to share comments and questions about this analysis via email at info@sharethecities.org.

Companion Policies

In May of 2021, Rainier Beach Action Coalition, the Multicultural Community Coalition and Puget Sound Sage came together and produced a report entitled "[Disaster Gentrification](#)." We want to take this opportunity to encourage city leaders and elected officials in the Puget Sound Region to adopt and robustly fund the policies recommended in this report alongside any zoning changes.

The report recommends:
1. Reduce evictions and foreclosures
2. Robustly fund acquisition and preservation accounts
3. Establish equitable development zones
4. Pass a Tenant/Community Opportunity to Purchase Act
5. Create Non-Solicitation/cease and desist zones
6. Tax certain real estate transactions to discourage property flipping for profit

City of Seattle Environmental Impact Statement (EIS) Scoping Report

EIS Scoping Report

EIS Scoping Detailed Comment Summary

Appendix A to Detailed Comment Summary: Letters and Emails

Appendix B to Detailed Comment Summary: Engagement Hub Comments

Appendix C to Detailed Comment Summary: Scoping Meetings Summary

Appendix D to Detailed Comment Summary: Community Liaison Debrief Meeting Summary

Acknowledgement

Thank you to the many volunteers in Share The Cities, and the Affordable Talaris working group, who contributed to this report, data analysis and increasing civic engagement in this important process in shaping Seattle's future. We are particularly grateful for the leadership of Shirley L. and James W. throughout this process.